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November 4, 2021

BY HAND DELIVERY & CM/ECF

The Honorable Leonard P. Stark
United States District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,
D. Del. C.A. No. 1:17-mc-00151-LPS

Dear Judge Stark:

Pursuant to the Court's October 29, 2021 Oral Order (D.I. 383, the "Oral Order"), on behalf of the Special Master, Crystallex, the Venezuela Parties, ConocoPhillips, the intervenors Blackrock Financial Management, Inc. and Contrarian Capital Management, L.L.C. (the "Intervenor Bondholders"), OI European Group, B.V. ("OIEG"), ACL1 Investments Ltd., ACL2 Investments Ltd., and LDO (Cayman) XVIII Ltd. (together "ACL"), and Huntington Ingalls Incorporated ("Huntington Ingalls") (collectively, the "Parties," and each a "Party"), I write in regards to the hearing scheduled for November 8, 2021 (D.I. 337, the "Hearing") in the above referenced matter.¹

The Parties met and conferred in response to the Court's Oral Order regarding the Hearing. The Parties propose the following presentations to the Court in the order below:

¹ All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the Court's May 27, 2021 Order Regarding Special Master (D.I. 277).

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Proposed Order	Party	Counsel	Estimated Time
1.	Special Master Robert. R Pincus	Ray C. Schrock, P.C., Weil, Gotshal & Manges LLP	15 minutes
2.	ConocoPhillips	Amy R. Wolf and Richard G. Mason, Wachtell, Lipton, Rosen & Katz	15 minutes
3.	Venezuela Parties	Nate Eimer, Eimer Stahl LLP Michael J. Gottlieb, Willkie Farr & Gallagher LLP	45 minutes to 60 minutes
4.	Crystallex	Miguel L. Estrada and Robert L Wiegel, Gibson, Dunn & Crutcher LLP	45 minutes to 60 minutes
5.	OIEG	Christopher L. Carter, Morgan Lewis & Bockius LLP	10 minutes
6.	Huntington Ingalls	Alexander A. Yanos, Alston & Bird LLP	5 minutes
7.	ACL	Joshua S. Bolian, Riley Warnock & Jacobson PLC	10 minutes
8.	Bolivarian Republic of Venezuela	George M. Garvey, Munger, Tolles & Olson LLP	15 minutes
9.	PDVSA	Julia B. Mosse, Curtis, Mallet-Prevost, Colt & Mosle LLP	5 to 10 minutes
10.	Intervenor Bondholders	Walter Rieman, Paul, Weiss, Rifkind, Wharton & Garrison LLP	3 minutes
Total Estimated Time:			203 minutes (or ~3.5 hours)

Accordingly, the Parties submit that the total time for the Parties' presentations will be approximately three and a half hours. Each Party requests the opportunity to respond to the other Parties' presentations as appropriate. The time for such responses is not included in the above

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list but the Parties expect that such responses will be limited, if any. The Parties also expect to spend time responding to any questions the Court may have.

The Parties remain available at the Court's convenience should Your Honor have any questions.

Respectfully submitted,

/s/ Myron T. Steele

Myron T. Steele (#00002)

*Counsel for Special Master
Robert B. Pincus*

cc: All Counsel of Record (via CM/ECF)
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